



RE: Siltronic, WS-33-81 DNAPL TCE Data and Data Trends

James Peale to: BAYUK Dana, McCue, Tom

04/25/2011 01:16 PM

Myron.Burr, "Gladstone, Alan", rjw, pdost, jedwards, cstivers, robe,
Cc: Rene Fuentes, Chip Humphrey, Kristine Koch, Sean Sheldrake,
PetersonLE, "ANDERSON Jim M", "GAINER Tom", "LARSEN
Henning", "Chris Reive"

2 attachments



Lf-Response to DEQ Comments.pdf Mf-WS-33-81 MGP DNAPL data submittal.pdf

Good afternoon Dana – attached please find the memorandum revised as suggested. As noted in the attached letter, it would be helpful to evaluate DEQ's comments on the memo in a collaborative setting. As we have discussed, DEQ comments regarding fill zone injections also warrant further discussion. Accordingly, Siltronic suggests meeting during the week of May 2 (either 5/2 or 5/3) or May 16 (5/16, 5/17, or 5/18[pm]) to discuss these and other source control related issues. Please let me know if you have any questions or comments.

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From: BAYUK Dana [mailto:BAYUK.Dana@deq.state.or.us]

Sent: Thursday, March 24, 2011 6:55 PM

To: McCue, Tom

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Subject: Siltronic, WS-33-81 DNAPL TCE Data and Data Trends

Hello Tom.

DEQ reviewed the technical memorandum titled, "ISCR-Enhanced Bioremediation Performance Monitoring Data Submittal DNAPL and Groundwater Data – WS-33-81, Siltronic Corporation – ECSI #183" dated January 17, 2011 (WS-33-81 Memorandum), and an electronic copy of our comments letter is attached.

<<Lf-nl-TCE_Trends-WS33-81_DNAPL.pdf>>

A signed hard copy of the letter will be sent via regular mail this week.

The WS-33-81 Memorandum presents the results of analyzing DNAPL samples collected from monitoring well WS-33-81 from February 2009 through October 2010. The memorandum also compares the DNAPL results with analyses of groundwater samples collected from the same installation and presents Siltronic's interpretation of the data.

The primary purpose of DEQ's letter is inform Siltronic we do not accept the interpretations and/or conclusions presented in the WS-33-81 Memorandum regarding TCE concentration trends in DNAPL samples. In addition, DEQ considers it premature for Siltronic to draw conclusions regarding the effectiveness of EHC/KB-1 at reducing daughter product concentrations as evaluation of the data being collected is ongoing.

Please note this determination does not change DEQ's previous acknowledgement regarding TCE concentrations in groundwater (i.e., currently concentrations of TCE in groundwater collected from Group 1 and Group 2 performance monitoring wells are less than the RAO #1 criterion of 11,000 ug/L).

Siltronic should revise and resubmit the memorandum to provide information regarding the potential presence of TCE DNAPL in the subsurface. This was the original objective of collecting and analyzing DNAPL samples for analysis, and it is not mentioned or discussed in the WS-33-81 Memorandum.

Please contact me with questions regarding this e-mail or the attachment.

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